

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

<b>IN RE:</b>	<b>Case No. 24-30167</b>
<b>Pro-Mark Services, Inc.,</b>	<b>Chapter 7</b>
<b>Debtor.</b>	<b>Chief Judge Shon Hastings</b>
<b>Erik A. Ahlgren, Trustee,</b>	
<b>Plaintiff,</b>	
<b>-v-</b>	<b>Adv. Case No. 24-07014</b>
<b>Connie Berg, et al.,</b>	
<b>Defendants.</b>	

**STIPULATED MOTION TO CONTINUE OCT. 23, 2025 SCHEDULE**

1. Plaintiff Erik A. Ahlgren and Defendants Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, and Kyle R. Berg Revocable Living Trust (collectively the “Berg Defendants”), and Miguel Paredes file this Stipulated Motion to Continue the hearing and telephonic scheduling conference set for October 23, 2025 for the following reasons.

2. On October 14, 2025, the Court set a hearing for October 23, 2025 (Dkt. 177) on Plaintiff’s Motion to Strike or, Alternatively, Dismiss in Part Defendant Miguel Paredes’ Answer and Affirmative Defenses to Plaintiff’s Second Amended Complaint. The Court had previously set a telephonic scheduling conference for that same day. (Dkt. 172.)

3. Counsel for Mr. Paredes is unavailable due to prior professional commitments on October 23, 2025.

4. On October 15, 2025, counsel for Plaintiff, the Berg Defendants, and Mr. Paredes discussed the Court’s order and agreed to file this Stipulated Motion requesting that both the hearing and the telephonic scheduling conference be continued to November 17 or 18, 2025.

5. Accordingly, the parties hereby move the Court for a continuance of the October 23, 2025 hearing and telephonic scheduling conference to either November 17 or November 18, 2025.

6. This Motion is not made for purposes of delay.

Dated: October 16, 2025

/s/ Peter D. Kieselbach (by email  
authorization on 10/16/2025 at 8:44 a.m.  
(EDT)  
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Dated: October 16, 2025

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Dated: *October 16, 2025*

/s/ Aimee M. Furness (by email  
authorization on 10/16/2025 at 8:51 a.m.  
(EDT)

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